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August 20, 2015

Via ECF

The Honorable Gary R. Brown
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

Re: *Luciano F. Paone v. Broadcom Corporation, et al.*,
Case Nos. 2:15-cv-596; 2:15-cv-608; 2:15-cv-610;
2:15-cv-639; 2:15-cv-647; E.D.N.Y.

Dear Judge Brown:

We represent Luciano F. Paone in the above-captioned actions. Pursuant to the Court's Order dated May 18, 2015, the Plaintiff was instructed to file a status letter regarding settlement conferences and the joint discovery schedule. The parties propose scheduling settlement conferences with Your Honor in early November at the Court's convenience. The parties propose submitting a joint discovery schedule on September 30, 2015, after each Defendant has had an opportunity to answer.¹

Very truly yours,

/s/ Sean T. Doyle
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¹ Several Defendants have not yet answered due to outstanding motions, all of which were denied on August 19, 2015.